

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

ETHAN ALLEN BROWN, JR.

Chapter 11

Debtor.

Case No. 09-32340

MOTION TO EMPLOY ATTORNEY

Movant respectfully represents:

1. Debtor filed a petition herein under Chapter 11 of the Bankruptcy Code.
2. Movant has continued in possession of its property, and Movant as debtor-in-possession is now operating its business and managing its property.
3. Movant as debtor-in-possession wishes to employ R. Keith Johnson of Law Offices of R. Keith Johnson, P.A., an attorney duly admitted to practice in this Court.
4. Movant has selected R. Keith Johnson for the reason that he has had considerable experience in matters of this character and believes that R. Keith Johnson is well qualified to represent it as debtor-in-possession in this proceeding.
5. The professional services that said R. Keith Johnson is to render are to give debtor legal advice with respect to its powers and duties as debtor-in-possession in the continued operation of its business and management of its property; to represent debtor in lawsuits now pending against debtor; and to perform all other legal services for debtor as debtor-in-possession which may be necessary herein. It is necessary for debtor as debtor-in-possession to employ an attorney for such professional services.
6. To the best of debtor's knowledge, said R. Keith Johnson has no connection with the creditors or any other party in interest or their respective attorneys.
7. Movant desires to employ R. Keith Johnson of Law Offices of R. Keith Johnson, P.A. under a general retainer because of the extensive legal services required.
8. R. Keith Johnson represents no interest adverse to debtor as debtor-in-possession or the estate in the matters upon which he is to be engaged for debtor as debtor-in-possession, and his employment would be to the best interests of this estate.

WHEREFORE, Movant prays that it be authorized to employ and appoint the said R. Keith Johnson of Law Offices of R. Keith Johnson, P.A. under a general retainer to represent it as debtor-in-possession under Chapter 11 of said Code, and that it have such other and further relief as is just.

This 13th day of September, 2009.


ETHAN ALLEN BROWN, JR., Debtor

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

ETHAN ALLEN BROWN, JR.

Debtor.

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AFFIDAVIT OF PROPOSED ATTORNEY

I, R. Keith Johnson, hereby make solemn oath:

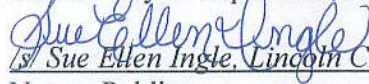
1. I am an attorney and counselor at law, duly admitted to practice in the State of North Carolina and in this Court.
2. I maintain an office for the practice of law at 1275 Hwy. 16 S., Stanley, NC 28164.
3. I have no connection with debtor, its creditors, or any other party in interest herein, or their respective attorneys.
4. I represent no interest adverse to debtor herein or its estate in the matters upon which I am to be engaged.

This 10th day of September, 2009.


R. KEITH JOHNSON
Bar No. 8840
Law Offices of R. Keith Johnson, P.A.
1275 Hwy. 16 S.
Stanley, NC 28164
(704) 827-4200

Sworn to and subscribed before me

this 10th day of September, 2009.


Sue Ellen Ingle, Lincoln County, NC
Notary Public

My Commission Expires: February 10, 2013

